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Attorney for Plaintiff, Brookmead Partners LP,
a Nevada Limited Partnership

UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF CALIFORNIA

BROOKMEAD PARTNERS LP, a Nevada Limited Partnership, Plaintiff, v. Interinsurance Exchange of the Automobile Club, a California business entity, Saracia L.P. Shannahan, and William P. Shannahan, Higgs, Fletcher & Mack, LLP, a California business entity, Defendants.	**Case No.** 08 CV-659-JLS (WMC) DECLARATION OF TYLER L. FARMER IN OPPOSITION TO ORDER TO SHOW CAUSE Date: TBA Time: Judge: Hon. Janis L. Sammartino

I, Tyler L. Farmer, declare as follows:

1. I am an attorney at law and admitted to practice in the States of California and Washington.

2. I am familiar with the procedural history of this action and have sufficient personal knowledge of the facts set forth herein. If called as a witness, I could and would testify competently to those facts under oath.

3. I am a resident of Seattle, Washington and currently practice law in Seattle, Washington and have resided here since February, 2007.

4. On September 27, 2007, I accepted an appointment as the Trustee of the MM Children's Trust in which William P. Shannahan is the Trustor.

5. All of my duties as Trustee, in connection with the MM Children's Trust have taken place in Seattle, Washington and this is the situs of administration of the MM Children's Trust.

6. I, as Trustee, of the MM Children's Trust do not have any direct interest in the Plaintiff, Brookmead Partners LP, a Nevada Limited Partnership.

7. However, I, as Trustee of the MM Children's Trust, have an indirect interest in the Plaintiff as follows:

a. I, as Trustee of the MM Children's Trust, am the Manager and Member of Kolmar LLC, a Nevada Limited Liability Company.

b. Kolmar LLC is the Manager and Member of Virginia Way LLC, a Nevada Limited Liability Company.

c. Virginia Way LLC is the general partner of the Plaintiff.

d. I, as trustee of the MM Children's Trust, on or about May 1, 2008, acquired 99% of Northwest Financial, Ltd., a Nevada limited partnership, a partner in the Plaintiff, from a foreign trust.

e. I, as trustee of the MM Children's Trust, on or about May 1, 2008, acquired 99% of BLLJ, a Nevada limited partnership, a partner in the Plaintiff from a foreign trust.

I declare under penalty of perjury under the laws of Washington that the above is true and correct. Executed on this 2 day of July, 2008 at Seattle, Washington.

TYLER L. FARMER